

Exhibit 4

1 B. Brett Heavner (*pro hac vice*)
b.brett.heavner@finnegan.com
2 **FINNEGAN, HENDERSON, FARABOW,**
GARRETT & DUNNER, LLP
3 901 New York Avenue NW
Washington, DC 20001-4413
4 Telephone: (202) 408-4000
Facsimile: (202) 408-4400

5 Morgan E. Smith (SBN 293503)
morgan.smith@finnegan.com
6 Daniel R. Mello (SBN 325714)
daniel.mello@finnegan.com
7 **FINNEGAN, HENDERSON, FARABOW,**
GARRETT & DUNNER, LLP
8 3300 Hillview Avenue
9 Palo Alto, California 94304
Telephone: (650) 849-6600
10 Facsimile: (650) 849-6666

11 Naoki Yoshida (*pro hac vice*)
naoki.yoshida@finnegan.com
12 **FINNEGAN, HENDERSON, FARABOW,**
GARRETT & DUNNER, LLP
13 33rd Floor, Shiroshima Trust Tower
3-1, Toranomon 4-chome
14 Minato-ku, Tokyo 105-6033 Japan
Telephone: 011-813-3431-6943
15 Facsimile: 011-813-3431-6945

16 Attorneys for Defendant
LEGALON TECHNOLOGIES, INC.

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 LEGALFORCE RAPC WORLDWIDE, P.C.,

21 Plaintiff,

22 v.

23 LEGALON TECHNOLOGIES, INC.,

24 Defendant.

CASE NO. 3:22-cv-07627-TLT

DECLARATION OF DANIEL LEWIS IN
SUPPORT OF DEFENDANT LEGALON'S
MOTION TO DISMISS PLAINTIFF'S
FIRST AMENDED COMPLAINT

Judge: Hon. Trina L. Thompson
Crtrm.: 9
Hearing Date: June 6, 2023
Time: 2:00 p.m.
Action Filed: December 3, 2022

DECLARATION

I, Daniel Lewis, declare as follows:

1. I am acting Chief Executive Officer of LegalOn, Technologies Inc (“LegalOn”). The matters stated herein are based upon my personal knowledge, and if called upon as a witness, would testify as to the following statements.

2. LegalOn is a Delaware corporation incorporated on or about September 19, 2022.

3. I joined LegalOn, located at 2 Embarcadero Center, 8th Floor – WeWork, San Francisco, CA 94111, as its Chief Executive Office on or about October 24, 2022.

4. My appointment was made public on or about December 1, 2022. Attached as **Exhibit 1** is a true and correct copy of my LinkedIn Page.

5. I graduated from Stanford Law School and received my J.D. in or about June 2012. I took and passed the California Bar Exam that summer. I became a licensed attorney in or about December 5, 2012. Since then, I have been an active member of the California Bar in good standing. Attached as **Exhibit 2** is a true and correct copy of my California State Bar Attorney Profile.

6. LegalOn offers artificial intelligence-powered contract review software to legal professionals and legal teams at law firms and corporations.

7. LegalOn’s target consumers are attorneys and legal professionals, primarily in-house corporate legal teams, not the general public or laypeople untrained in the practice of law.

8. LegalOn’s software is a tool for attorneys and legal professionals to utilize in reviewing a contract for their client, primarily in-house legal teams serving the contracting needs of their company.

9. LegalOn’s software is not intended for, nor designed to be used by, untrained members of the general public.

10. LegalOn does not engage in the practice of law, does not advertise itself as engaged in the practice of law, and does not hold itself out as practicing law.

11. LegalOn does not use and has not applied to register the LEGALFORCE trademark in the United States or anywhere in the world.

12. LegalOn does not own a LEGALFORCE trademark.

1 13. LegalOn does not offer any products or services bearing the LEGALFORCE
2 trademark.

3 14. LegalOn does not have any plans to imminently or ever offer, sell, transport, distribute,
4 market, or advertise any products or services bearing the LEGALFORCE trademark.

5 15. LEGALFORCE is a trademark owned and used by LegalOn's parent company,
6 LegalOn Technologies, Inc. (Japan) formerly d/b/a LegalForce, Inc. ("LegalForce").

7 16. It is my understanding based on publicly available information that LegalForce is a
8 Japanese corporation organized under the laws of Japan, headquartered and with a principal place of
9 business in Tokyo, Japan.

10 17. It is my understanding based on publicly available information that LegalOn's parent
11 company, LegalForce, is the defendant in the case *LegalForce RAPC Worldwide P.C. v. LegalForce,*
12 *Inc.*, Case No. 3:22-cv-03724-TLT ("LegalForce Action") and is not a party to this action.

13 18. It is my understanding based on publicly available information that in the LegalForce
14 Action, LegalOn's parent company LegalForce asserted that it owns and uses the LEGALFORCE
15 mark in Japan and not in the United States.

16 19. LegalOn is and has always been a distinct legal entity from LegalForce.

17 20. LegalOn has its own corporate officers and employees, maintains its own corporate
18 records, utilizes different office space from LegalForce, manages its own day-to-day activities, does
19 not commingle funds or other assets with LegalForce, does not hold itself out as liable for LegalForce's
20 debts, and does not disregard corporate formalities between LegalOn and LegalForce.

21 21. It is my understanding based on publicly available information that before
22 incorporating LegalOn, non-party LegalForce raised venture capital from investors during meetings it
23 held in Japan beginning sometime before summer 2022.

24 22. LegalOn did not hold or attend those meetings and did not solicit venture capital from
25 investors since LegalOn did not exist during the summer of 2022 and was not incorporated until
26 September of that year.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of February 2023, at San Francisco, California.

Daniel Lewis